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July 22, 2021

Application DENIED. No party seeks to maintain the letter at Dkt. No. 116 under seal.

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

The Clerk of Court is respectfully directed to close the motion at Dkt No. 115 and unseal the motion at Dkt. No. 116.

Dated: July 30, 2021

New York, New York

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):
Request to File Under Seal


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation (“Plaintiff”), in accordance with Paragraph I.D.3 of Your Honor’s Individual Rules, to request leave to file under seal Plaintiff’s pre-motion letter seeking to strike improper rebuttal opinions submitted by Defendants’ valuation expert, Marc J. Brown (the “Letter”). Parties and attorneys of record who should have access to the sealed document are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the “Confidentiality Order”). Plaintiff’s Letter references expert reports deemed Confidential Information or Discovery Material, as defined in the Confidentiality Order.

Pursuant to Paragraph I.D.3 of Your Honor’s Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Letter and, therefore, absent objection by Defendants would propose to file the Letter on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

Respectfully Submitted,

/s/ Mark E. McDonald

Mark E. McDonald

cc: All Counsel of Record (via ECF)

Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

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